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United States Bankruptcy Court
District of New Jersey -- Newark
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In re:

Sean Lewis

Chapter 13

Case # 19-23159-VFP

Debtor

Hearing Date: Aug. 19, 2021
Time: 10:00 a.m.

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**DEBTOR'S COUNSEL'S REPLY CERTIFICATION IN OPPOSITION TO STAY RELIEF
MOTION**

Nicholas Fitzgerald, being of full age and being the above named debtor's counsel, certify under penalty of perjury that:

1. I make this reply certification in opposition to US Bank-Cust Tower DB VIII 2018-1's, the "tax lienholder's" supplemental certification which is dated July 28, 2021.

2. I completely agree with the movant that post-petition real estate taxes must be paid on the debtor's real property and that if the debtor's mortgagee, which has funds in a tax escrow, is not paying those taxes, that the debtor must pay them himself.

3. In addition to the \$1,206.92 in alleged post-petition real estate taxes owed, the tax lienholder claims that the following post-petition amounts are due of which the debtor **objects**:

June 16, 2021 -- \$50 -- filing fee
June 16, 2021 -- \$405 -- filing fee
June 16, 2021 -- \$700 -- legal fee
June 16, 2021 -- \$100 -- title search
June 16, 2021 -- \$475 -- title search

Total: \$1,730

4. The movant fails to address a key issue which is the debtor's counsel's contention that the movant is **not** entitled to legal fees and costs in regards to the debtor's alleged failure to pay post-petition taxes. All that they state is the obvious: "The fees listed on the statement are not the subsequent taxes." See Paragraph 8 of the Supplemental Certification.

5. If the movant believes that they are entitled to these fees and costs they need to provide a legal basis for that contention.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: July 29, 2021



Nicholas Fitzgerald
Debtors' Counsel